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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Debtor.

**NOTICE OF AGENDA FOR MATTERS SCHEDULED  
FOR HEARING ON SEPTEMBER 20, 2023 AT 10:00 A.M.**

**CONTESTED MATTERS**

1. **23-01098; Picard v. Martin Sage and Sybil Sage**

- A. Motion to Dismiss Adversary Proceeding filed by Richard A. Kirby on behalf of Martin Sage, Sybil Sage (Filed: 5/25/2023) [ECF No. 5]

**Opposition Due:** August 16, 2023

**Opposition Filed:**

- B. Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss the Complaint filed by Lan Hoang on behalf of Irving H. Picard (Filed: 8/16/2023) [ECF No. 16]
- C. Declaration of Lan Hoang in Support of Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss the Complaint filed by Lan Hoang on behalf of Irving H. Picard (Filed: 8/16/2023) [ECF No. 17]

**Replies Due:** September 13, 2023

**Replies Filed:**

- D. Reply Motion to Dismiss Adversary Proceeding filed by Richard A. Kirby on behalf of Martin Sage, Sybil Sage (Filed: 9/13/2023) [ECF No. 21]

**Related Documents:**

- E. Notice of Motion filed by Richard A. Kirby on behalf of Martin Sage, Sybil Sage (Filed: 5/24/2023) [ECF No. 4]
- F. Stipulation and Order signed on 7/6/2023. (DuBois, Linda) (Entered: 07/06/2023) [ECF No. 10]
- G. Stipulation and Order signed on 9/7/2023. (DuBois, Linda) (Entered: 09/07/2023) [ECF No. 20]

**Status:** This matter is going forward.

2. **23-01099; Picard v. Malcolm Sage and Lynne Florio**

- A. Motion to Dismiss Adversary Proceeding (Notice of Motion and Memorandum of Law in Support) filed by Jonathan T. Koevary on behalf of Lynne Florio, Malcolm Sage (Filed: 6/30/2023) [ECF No. 26]

**Opposition Due:** August 16, 2023

**Opposition Filed:**

- B. Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss the Complaint filed by Lan Hoang on behalf of Irving H. Picard (Filed: 8/16/2023) [ECF No. 32]
- C. Declaration of Lan Hoang in Support of Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss the Complaint filed by Lan Hoang on behalf of Irving H. Picard (Filed: 8/16/2023) [ECF No. 33]

**Replies Due:** September 13, 2023

**Replies Filed:**

- D. Defendants' Reply Memorandum in Further Support of Their Motion to Dismiss filed by Thomas J. Fleming on behalf of Lynne Florio, Malcolm Sage (Filed: 9/13/2023) [ECF No. 35]

**Related Documents:**

- E. So Ordered amended and Corrected Stipulation Granting Defendants' Motion to Extend Time signed on 6/23/2023. (DuBois, Linda) (Entered: 06/23/2023) [ECF No. 20]

**Status:** This matter is going forward.

3. **10-05354; Picard v. ABN AMRO Bank, N.V. (presently known as NatWest Markets N.V.)**

- A. Memorandum Of Law in Support of NatWest Markets N.V.'S Motion to Amend Affirmative Defenses filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (Filed: 8/24/2023) [ECF No. 279]

**Opposition Due:** September 13, 2023

**Opposition Filed:**

- B. Memorandum of Law in Opposition to Defendant's Motion to Amend Affirmative Defenses filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 9/13/2023) [ECF No. 282]

**Replies Due:** September 18, 2023

**Replies Filed:**

- C. Reply in Further Support of NatWest Markets N.V.'s Motion to Amend Affirmative Defenses filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (Filed: 9/18/2023) [ECF No. 23584]

**Related Documents:**

- D. Motion to Amend NatWest Markets N.V.'s Affirmative Defenses filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (Filed: 8/24/2023) [ECF No. 278]

**Status:** This matter is going forward.

4. **08-01789; SIPC v. BLMIS**

- A. Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 8/2/2023) [ECF No. 23449]

**Opposition Due:** September 6, 2023

**Opposition Filed:**

- B. Opposition of Objecting Defendants to Trustee's Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by Lindsay Funk on behalf of Multi-Strategy Fund Limited (Filed: 9/6/2023) [ECF No. 23516]
- C. Notice of Joinder filed by Anthony L. Paccione on behalf of Banque SYZ SA, Guernroy Limited, RBC Alternative Assets, L.P., Royal Bank of Canada (Filed: 9/6/2023) [ECF No. 23518]
- D. Notice of Joinder filed by Anthony L. Paccione on behalf of Banco Inversis, S.A., RBC Investor Services Trust, RBC Investor Services Bank S.A. (Filed: 9/6/2023) [ECF No. 23520]
- E. Notice of Joinder filed by Joseph Cioffi on behalf of Bloom Asset Holdings Fund, Natixis Financial Products LLC (Filed: 9/6/2023) [ECF No. 23522]
- F. Notice of Joinder filed by Joseph Cioffi on behalf of Natixis S.A. (Filed: 9/6/2023) [ECF No. 23523]
- G. Notice of Joinder in Objecting Defendants' Opposition to Trustee's Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by John F. Zulack on behalf of Bordier & Cie (Filed: 9/6/2023) [ECF No. 23524]
- H. Joinder to Objection to the Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by Douglas A. Kellner on behalf of Parson Finance Panama S.A. (Filed: 9/6/2023) [ECF No. 23525]
- I. Notice of Joinder filed by Daniel Shamah on behalf of Zehpyros Limited (Filed: 9/6/2023) [ECF No. 23527]
- J. Notice of Joinder filed by Daniel Shamah on behalf of Credit Suisse AG (as successor-in-interest to Clariden Leu AG and Bank Leu AG) (Filed: 9/6/2023) [ECF No. 23528]

- K. Notice of Joinder filed by Daniel Shamah on behalf of Mistral (SPC) (Filed: 9/6/2023) [ECF No. 23529]
- L. Notice of Joinder filed by Daniel Shamah on behalf of Credit Suisse (Luxembourg) SA, Credit Suisse (UK) Limited, Credit Suisse AG, Credit Suisse AG, Nassau Branch, Credit Suisse International, Credit Suisse London Nominees Limited, Credit Suisse Nominees (Guernsey) Limited (Filed: 9/6/2023) [ECF No. 23530]
- M. Statement of Joinder in ECF No. 23516 filed by Joshua E. Abraham on behalf of BG Valores, S.A., f/k/a Wall Street Securities S.A., Banco General, S.A. (Filed: 9/6/2023) [ECF No. 23531]
- N. Notice of Joinder filed by Pamela Miller on behalf of Merrill Lynch International (Filed: 9/6/2023) [ECF No. 23532]
- O. Notice of Joinder filed by Pamela Miller on behalf of Merrill Lynch Banc (Suisse) S.A. (Filed: 9/6/2023) [ECF No. 23533]
- P. Notice of Joinder filed by Christopher Harris on behalf of ABN AMRO Bank (Ireland) LTD. (f/k/a Fortis Prime Fund Solutions Bank (Ireland) Limited), ABN AMRO Custodial Services (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Custodial Services (Ireland) Ltd.) (Filed: 9/6/2023) [ECF No. 23534]
- Q. Notice of Joinder filed by Christopher Harris on behalf of ABN AMRO Fund Services (Isle of Man) Nominees Limited (Filed: 9/6/2023) [ECF No. 23537]
- R. Joinder in Objecting Defendants' Opposition to Trustee's Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by Steven Froot on behalf of ZCM Asset Holding Company (Bermuda) LLC (Filed: 9/6/2023) [ECF No. 23539]
- S. Notice of Joiner filed by Kelly Lin on behalf of Naidot & Co. and Bessemer Trust Company (Filed: 9/6/2023) [ECF No. 23540]
- T. Notice of Joinder in Objecting Defendants' Opposition to Trustee's Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 (Adv. Pro. 12-01693) filed by John F. Zulack on behalf of Banque Lombard Odier & Cie SA (Filed: 9/6/2023) [ECF No. 23541]
- U. Notice Of Joinder filed by David W Parham on behalf of Cathay Life Insurance Co. LTD. (Filed: 9/6/2023) [ECF No. 23543]
- V. Notice of Joinder filed by Gregory F. Hauser on behalf of LGT Bank (Switzerland) Ltd., LGT Bank in Liechtenstein Ltd. (Filed: 9/6/2023) [ECF No. 23544]

- W. Notice of Joinder in Objecting Defendants' Opposition to Trustees Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by Michael S. Feldberg on behalf of ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.), ABN AMRO Bank N.V (Presently known as NatWest Markets N.V.) (Filed: 9/6/2023) [ECF No. 23545]

**Replies Due:** September 15, 2023

**Replies Filed:**

- X. Reply Memorandum of Law in Further Support of Motion for Order Amending Order Appointing a Discovery Arbitrator (related document(s)23449) filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 9/15/2023) [ECF No. 23576]

**Related Documents:**

- Y. Amended Notice of Motion for Order Amending Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 8/7/2023) [ECF No. 23454]

**Status:** This matter is going forward.

Dated: September 18, 2023  
New York, New York

Respectfully submitted,

/s/ Nicholas J. Cremona

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Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
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